



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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February 19, 2025

*Via ECF*

The Honorable Steven L. Tiscione  
United States District Court for the  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

**Re: Garcia, et al. v. Aviles-Ramos, et al., No. 19 CV 3342 (ST)**

Dear Magistrate Judge Tiscione:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, Muriel Goode-Trufant, attorney for the Defendants in the above-referenced action. I write to provide the Court with the attached **proposed Supplemental Stipulation and Order** of Settlement for endorsement, upon the Court's review. This supplemental stipulation and order will solely modify the definition of "Effective Date" in the Stipulation and Order of Settlement that the Court endorsed on January 31, 2025, (**ECF No. 156**). As the Court will note, the parties' counsel have respectively countersigned this document.

I thank the Court for its consideration of these matters.

Respectfully yours,

/s/ David S. Thayer

David S. Thayer

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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VERONICA GARCIA, JANE DOE, HUI QUIN LIU,  
MARCELA HERNANDEZ and ALLIANCE FOR  
FAMILIES WITH DEVELOPMENTAL NEEDS,

*Plaintiffs,*

-against-

MELISSA AVILES-RAMOS, as Chancellor of the New  
York City Schools of the New York City Department of  
Education; the New York City Department of Education;  
and the City of New York,

*Defendants.*  
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**SUPPLEMENTAL  
STIPULATION AND ORDER  
OF SETTLEMENT**

19 CV 3342 (ST)

**WHEREAS**, Plaintiffs Veronica Garcia, Jane Doe, Hui Quin Liu, Marcela Hernandez, and the Alliance for Families with Developmental Needs (collectively, “Plaintiffs”) filed a Complaint (the “Complaint”) on June 5, 2019, alleging that Defendants Richard A. Carranza, in his official capacity as Chancellor of the New York City Department of Education, the New York City Department of Education (“DOE”), and the City of New York (the “City”), violated Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000 *et seq.*, the Individuals with Disabilities Act, 20 U.S.C. § 1400 *et seq.*, the Equal Educational Opportunities Act, 20 U.S.C. §§ 1701-1758, and the New York City Human Rights Law, N.Y.C. Admin. Code § 8-107, through the DOE’s alleged failure to provide sufficient language access services;

**WHEREAS**, Melissa Aviles-Ramos was appointed Chancellor of the City School District of the City of New York (also known as the New York City Department of Education) and, accordingly, was automatically substituted as a defendant in the place of Richard A. Carranza pursuant to Rule 25(d) of the Federal Rules of Civil Procedure;

**WHEREAS**, the parties signed a proposed Stipulation and Order of Settlement on January 24, 2024, and filed it with the Court on that day (ECF No. 154-1);

**WHEREAS**, the Court endorsed the parties' Stipulation and Order of Settlement by so-ordering it on January 31, 2025 (ECF NO. 156);

**WHEREAS**, the parties collectively wish to amend the Stipulation and Order of Settlement (ECF No. 156) as set forth below;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and among the parties through their undersigned counsel, as follows:

1. The term "Effective Date," as defined at Paragraph 1(f) of the Stipulation and Order of Settlement (ECF No. 156), is hereby amended to provide the following: "Effective Date" shall mean January 27, 2025.

2. Whenever the term "Effective Date" appears in the Stipulation and Order of Settlement, it shall be construed as meaning January 27, 2025. This Supplemental Stipulation and Order shall not otherwise affect the construction of any other term of the Stipulation and Order of Settlement.

Dated: February 13, 2025  
New York, New York

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By: David S. Thayer  
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It is **SO ORDERED** this \_\_\_\_\_ day  
of \_\_\_\_\_, 2025.

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STEVEN L. TISCIONE  
United States Magistrate Judge